



## The California Desert Coalition

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November 19, 2008

California Energy Commission  
Attention: Clare Laufenberg Gallardo  
1516 Ninth Street, MS 46  
Sacramento, CA 95814  
BY EMAIL – ORIGINAL BY MAIL  
Re: RETI Phase 1B report

Dear Ms. Gallardo:

Thank you for the opportunity to comment on the RETI Phase 1B Report. These comments are being submitted on behalf of the California Desert Coalition.

We applaud the state of California for taking a leadership role in combating global climate change, and recognize the challenges of the ambitious goals for green-house gas reduction and renewable energy development.

The California Desert Coalition is a non-partisan citizen action group that formed in response to a project threatening pristine desert lands currently in conservation. As we continued to research that project it became evident that it was connected to several other processes occurring in the west in regards to energy. In September of 2007 we became aware of the Renewable Energy Transmission Initiative (“RETI”) and its mission.

An excerpt from the RETI mission statement document reads: RETI “is a statewide planning process that will identify the transmission projects needed to accommodate these renewable energy goals. RETI is an open and transparent collaborative process in which all interested parties are encouraged to participate.”

The California Desert Coalition was turned down for membership and participation in December of 2007. As a diverse citizen action group, with members representing a region of the Mojave Desert we were very frustrated by this result. Be that as it may, after being rejected from the formal RETI process we focused our limited resources elsewhere.

We have reviewed the 2008 Phase 1B Draft Report and offer the following comments:

1) Recognizing the good intentions behind RETI, it is nonetheless essential to also understand and acknowledge the inherent limitations of RETI's process and its shortcomings in representing a broad stakeholder audience. The vast majority of the stakeholder members were from industry, most with a special-interest driven agenda of maximizing energy development. There were no stakeholder group members representing ratepayers or taxpayers.

2) The maps released to identify the proposed California Renewable Energy Zones (CREZ) did not show any detail and thus reflect how the CREZ and transmission projects appear on the landscape. More detailed maps including but not limited to the following layers must be available: topography, road and highway, public lands and conservation lands (and their state/federal designations), private preserves purchased for conservation, lands identified for conservation in Habitat Conservation Plans and Natural Communities Conservation Plans, existing transmission corridors, proposed project sites, etc.

3) We are concerned with the results of the environmental ranking process in the Phase 1B Draft Report. The Environmental Working Group, which conducted the environmental ranking, was comprised of only two voting members from the environmental community, neither of which have specific expertise in the California Desert, and several voting members from industry and the non-environmental community. As a result, several concerns including areas recommended for exclusion, were not considered and reflected in the report.

4) In order to calculate costs for comparing the benefits of different energy zones, certain assumptions were made about the cost to provide transmission to them. The Working Group decided that several planned, yet not approved, transmission projects would be presumed available. Notably, these projects included the extremely controversial Green Path North and Sunrise Powerlink. RETI is therefore misrepresenting the state and public processes for such projects but implying they are a done deal. Furthermore, since these transmission projects were assumed to be part of the base case scenario, the costs of these projects were assumed to be zero. This misleading assumption skews the environmental ranking of renewable zones that would be served by these “available” transmission projects and gives those zones a higher economic ranking. The reality is that these projects, in addition to their high environmental costs, do have enormous capital costs, which, if incurred, will be passed on to ratepayers.

5) In addition, the report fails to analyze the comparative efficiency of direct-to-grid power (such as photovoltaic (“PV”) energy), as opposed to transmission-dependent power. In a time and field where technology options and innovation are so quickly enhancing the options for direct-to-grid power, it seems short-sighted and irresponsible to not include such options into the equation so that California residents can best enjoy affordable clean energy without sacrificing public recreation and conservation lands.

6) We believe that the CREZ should not recommend or site projects in areas that impact private, state or federal areas set aside to protect significant biological, cultural resources and other natural resource values of state or national significance. These include Wilderness Areas, Wilderness Study Areas, National and State Parks, Areas of Critical Environmental Concern, and private nature preserves. The California desert is a valuable resource but its value extends beyond that of its monetary values for large-scale solar corporations to harvest and exploit for distant urban centers. It is simply not necessary to destroy vast areas of pristine public land and other protected areas to address global warming while other options have not been included or developed.

Thank you for the opportunity to comment on the Phase 1B report and the RETI effort in general.

Sincerely,



April Sall  
Chair